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April 8, 2024

**By ECF**

The Honorable Gabriel W. Gorenstein  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007-1312

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Re: *Eckhart v. Fox News Network, LLC, et al.*, Case No. 1:20-cv-5593 (RA) (GWG)

Dear Judge Gorenstein:

We represent Defendant Fox News Network, LLC in the above-referenced matter. We write jointly with Plaintiff Jennifer Eckhart and Defendant Ed Henry (collectively, the “Parties”) in furtherance of the joint letter submitted on March 29, 2024 (Dkt. 320), to respectfully request an extension of the deadlines for expert discovery. An extension would require a change to the following existing expert discovery deadlines:

- Disclosure of Expert Discovery by March 29, 2024;
- Disclosure of Rebuttal Expert Evidence by April 30, 2024; and
- Completion of Expert Depositions by June 14, 2024.

The Parties have been working cooperatively to complete expert discovery. The Parties agree that an extension is needed in order for Fox News to obtain additional records pertaining to Plaintiff’s mental health treatment, which Fox News’s expert requires in order to complete his report. Additionally, the Parties are conferring regarding a request by Fox News for additional medical records. The Parties are meeting and conferring and hope to resolve these issues, but may request a discovery conference before Your Honor if they reach an impasse.

The Parties will submit a proposed expert discovery schedule to the Court by the end of this week, or, if the parties reach an impasse, they will request a discovery conference.

The Parties’ anticipated request does not require a change of the June 20, 2024 deadline to file motions for summary judgment.

We thank the Court for its consideration and attention to this matter.

Respectfully submitted,

/s/ Kathleen M. McKenna



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Cc: All counsel of record (via ECF)